



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

WK
F. #2016R01805

*271 Cadman Plaza East
Brooklyn, New York 11201*

August 22, 2019

By Email and ECF

All Counsel on Attached Appendix A

Re: United States v. Jeffrey Chartier, et al.
Criminal Docket No. 17-372 (JS)

Dear Counsel:

Enclosed please find discovery provided by the government in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This disclosure supplements the government's earlier disclosures. The government again requests reciprocal discovery from the defendants.

The government has made the following materials available at First Choice Copy ("First Choice") for reproduction to the defendants:

Source	Description	First Bates	Last Bates
Southern District of Texas Houston Division Bankruptcy Court	Official HECC Bankruptcy documents	EDNY-PTP_000637197	EDNY-PTP_000637205
FBI	YouTube videos	EDNY-PTP_000637206	EDNY-PTP_000637212
FINRA	Series 7 Study Guide (1986)	EDNY-PTP_000637213	EDNY-PTP_000637274
FINRA	Series 63 Study Guide (1979)	EDNY-PTP_000637275	EDNY-PTP_000637377
FINRA	Watts CRD	EDNY-PTP_000637378	EDNY-PTP_000637419
JPMC	Business Records Affidavit for 11/21/2016, 11/30/2016, 6/15/2017, 6/21/2017, 7/19/2017, and 11/24/2017 Productions	EDNY-PTP_000637420	EDNY-PTP_000637420
JPMC	Supplemental documents regarding SMDRE Acct #7317	EDNY-PTP_000637421	EDNY-PTP_000637430
R. Gleckman	Various documents	EDNY-PTP_000637431	EDNY-PTP_000637911
SEC	Updated blue sheet data for victim loss	EDNY-PTP_000637912	EDNY-PTP_000637912
SEC	Updated blue sheet data for perpetrators	EDNY-PTP_000637913	EDNY-PTP_000637913
Apex Clearing	Victim trading records for CESX, GRLD, HECC, ICEIF, NWMH	EDNY-PTP_000637914	EDNY-PTP_000637915

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Source	Description	First Bates	Last Bates
Charles Schwab	Victim trading records for CESX, GRLD, ICEIF, NWMH, HECC	EDNY-PTP_000637916	EDNY-PTP_000637922
D.A. Davidson & Co.	Victim trading records for HECC	EDNY-PTP_000637923	EDNY-PTP_000637933
E-Trade	Victim trading records for HECC, ICEIF, CESX, GRLD, NWMH	EDNY-PTP_000637934	EDNY-PTP_000637935
First Clearing Corp (Wells Fargo)	Victim trading records for CESX trade blotter information	EDNY-PTP_000637936	EDNY-PTP_000637937
Hilltop Securities	Account records for: <ul style="list-style-type: none"> • Michael Watts, Acct #9040 • Geoserve Marketing, Acct #4757 • SMDRE, Acct #7246 	EDNY-PTP_000637938	EDNY-PTP_000639602
Hilltop Securities	Supplemental trading records for Accts #9040, #7246	EDNY-PTP_000639603	EDNY-PTP_000639603
Interactive Brokers	Victim trading records for CESX, GRLD, HECC, ICEIF, NWMH	EDNY-PTP_000639604	EDNY-PTP_000639609
National Financial Services (Fidelity)	Victim trading records for CESX, GRLD, ICEIF, NWMH	EDNY-PTP_000639610	EDNY-PTP_000639611
OptionsXpress (Charles Schwab)	Victim trading records for CESX, HECC, ICEIF, NWMH	EDNY-PTP_000639612	EDNY-PTP_000639613
Pershing (BNY Mellon)	Victim trading records for CESX, GRLD, HECC, ICEIF, NWMH	EDNY-PTP_000639614	EDNY-PTP_000639619
Sterne Agee & Leach (INTL FCStone)	Victim trading records for CESX, HECC, and NWMH	EDNY-PTP_000639620	EDNY-PTP_000639627
TD Ameritrade	Victim trading records for HECC, CESX, NWMH, GRLD, ICEIF	EDNY-PTP_000639629	EDNY-PTP_000639632
SEC	Documents related to Elite Stock Research	SEC-EDNY-EPROD-000116447	SEC-EDNY-EPROD-000116877
SEC	Documents related to ICEIF	SEC-EDNY-EPROD-000118754	SEC-EDNY-EPROD-000120277
SEC	Documents related to NWMH GRLD, HECC, CESX	SEC-EDNY-EPROD-0001252939	SEC-EDNY-EPROD-000414437
SEC	Documents related to CESX	SEC-EDNY-EPROD-000414438	SEC-EDNY-EPROD-000422291 ¹

Where affidavits concerning the authenticity of business records are included herein or in previous discovery productions, per Federal Rules of Evidence 803(6) and 902(11) the government intends to proffer those records into evidence at trial as self-authenticating. See United States v. Komasa, 767 F.3d 151 (2d Cir. 2014).

¹ Documents described in the last four rows of this chart (SEC-sourced) fall within the ranges specified as the first and last Bates numbers for each row. They encompass only portions of each range, however, and not the entirety of each.

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You may obtain copies of the materials listed above by contacting Joseph Meisner at First Choice at 718-381-1480, extension 212, and referencing the print order number provided by email. First Choice is located at 52-08 Grand Avenue, Maspeth, New York 11378.

Very truly yours,

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cc: Clerk of the Court (JS) (by ECF)

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